

As a ham of approximately 50 yrs, I have seen many uses of 160M, from the days of Class A/B/C phone privileges during AM, to the Loran restrictions, to current day usage. In terms of weak signal detection, it is quite apparent that CW or other either on/off or freq shift modes are quite superior in ability to detect. Probably 95+ % of my operations on 160 is cw, with a real interest in marginal weak signal work.

I would strongly recommend a segregation of voice/cw-digital modes in terms of band allocations, as this works well on all other ham bands, and should be utilized on the 160 band as well.

For some time the "gentleman's agreement" of mode/frequency usage has worked for the most part, however it appears there is a general shift of personalities within the ham ranks, with many of the "problem makers" migrating to the 160 band. This will in my opinion continue with the changes recently made in more lenient licensing structures, and with the propagation changes incurred with the sunspot cycle over the next few years.

In order to address these needs, there should be strong consideration to approve subject RM in an effort to address these changes beforehand, rather than during or after the fact.

If weak signal work and marginal propagation conditions are to be addressed as an area for pioneering development work, this effort should not be fractured by allowing mixed mode usage in the same frequency range. This RM only asks for 20% of the band usage to be exclusively assigned in this manner, whereas most other ham bands provide a much higher percentage for this exclusive mode assignment/usage.

Approval of subject RM would certainly help structure the usage of the 160 band to help mitigate some of the downstream consequences of no specific band plan definition.

For the above reasons, I encourage your review/approval of subject RM.